

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

R.I. SEEKONK HOLDINGS, LLC.

Plaintiff

VS.

C.A. No. 04 CV 11682 NMG

**TIMOTHY P. McINERNEY, INDIVIDUALLY
AND IN HIS CAPACITY OF TOWN
ADMINISTRATOR of the TOWN OF
SEEKONK and TOWN OF SEEKONK**

Defendants

JOINT PROPOSED PRETRIAL SCHEDULE

All parties in the above captioned matter move this Court to adopt the following proposed pretrial schedule:

<u>Event</u>	<u>Date</u>
Amendments to Pleadings (to and include Third Party Actions)	July 29, 2005
Non-Expert Discovery	December 15, 2005
Plaintiff's Expert Reports	January 20, 2006
Defendant's Expert Reports	January 24, 2006
All Discovery to be Completed	March 17, 2006
Motions for Summary Judgment	April 18, 2006
Oppositions to Summary Judgment	May 18, 2006
Hearing on Summary Judgment Motion(s)	To Be Determined
Pretrial Conference	To Be Determined

Respectfully Submitted,

Plaintiffs,
By its attorney,

Defendant
By its attorney,

/s/ John B. Reilly

John B. Reilly, Esq.
(BBO # 545576)
John Reilly & Associates
Summit West - Suite 330
300 Centerville Road
Warwick, Rhode Island 02886
(401) 739-1800
FAX: (401) 738-0258

/s/ Jeremy Silverfine

Jeremy Silverfine, Esq.
(BBO #542779)
Brody Hardoon Perkins & Kesten
1 Exeter Plaza
Boston, Massachusetts 02116
(617) 880-7100
Fax: (617) 880-7171

DATED: January 19, 2005